

EXHIBIT A

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5
6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF ARIZONA

8 IN RE: Bard IVC Filters Products Liability
9 Litigation

No. 2:15-MD-02641-DGC

10 **DECLARATION OF CALLE M.
MENDENHALL IN SUPPORT OF
APPLICATION FOR APPOINTMENT ON
11 PLAINTIFF STEERING COMMITTEE**

12 I, Calle M. Mendenhall declare as follows:

13 1. I am an attorney at law duly licensed to practice and appear as Attorney of record in all filings
14 made on behalf of my firm, Farris, Riley & Pitt, LLP in this litigation and in other mass tort
15 litigations in which Farris, Riley & Pitt, LLP is involved. I act as the firm's mass tort director and as
16 such, I have knowledge of the matters contained herein and they are true and correct of my own
17 personal knowledge. If called and sworn as a witness, I could and would testify competently thereto.

18 2. I make this declaration in support of my application for appointment on the steering
19 committee in this litigation. A true and correct copy of my curriculum vitae and list of representative
20 mass tort trials is included herewith.

21 3. I have represented clients in mass tort litigations involving pharmaceuticals and medical
22 devices for the entirety of my time practicing law. During this time, I have been a member of

1 roughly six mass tort trials, including MDL bellwether trials. I have handled every facet of a mass
2 tort case from pre-litigation strategy, discovery and motion practice, including aiding current
3 members of this PSC with depositions and dispositive briefing, and helping try cases to verdict in
4 other litigations. I am very familiar with this litigation and its current progress. Additionally, I was
5 appointed to the Plaintiffs' Leadership Committee in the Cordis IVC Filter Alameda County,
6 California Litigation in or around April, 2018, and currently oversee and manage document
7 production and review for all Plaintiff litigants.

8 4. Current PSC Member, Nathan C. VanDerVeer, was an attorney for Farris, Riley & Pitt, LLP
9 until late September, 2018. At this time, I joined the firm and took over the handling of Farris, Riley
10 & Pitt, LLP's open and active mass tort cases, including all cases with the firm in this litigation.

11 5. Farris, Riley & Pitt, LLP has handled products liability litigation since its inception over
12 twenty years ago. The firm has been active in mass tort litigations for nearly ten years and is
13 currently working on cases in roughly four other multi-district or state court consolidated litigations.
14 Farris, Riley & Pitt, LLP has timely paid all assessments in this litigation to date as part of Nathan
15 VanDerVeer's inclusion on the Plaintiff Steering Committee. Farris, Riley & Pitt, LLP will continue
16 to honor its agreement to pay assessments and any other further Orders of this Court or directives
17 from the Plaintiffs' Co-Leads.

18 I declare under penalty of perjury that the foregoing is true and correct and that this
19 Declaration is executed on January 9, 2019.

20 

21 Calle M. Mendenhall

Calle M. Mendenhall

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LEGAL EXPERIENCE

Farris, Riley & Pitt, LLP

Birmingham, AL

Attorney and Mass Torts Director (2018 – Present)

Experience representing clients in pharmaceutical and medical device mass torts, medical malpractice, and catastrophic injury cases. Current member of the Cordis IVC Filter Plaintiff Leadership Committee for the consolidation pending in Alameda County, California.

Experience includes: researching and drafting complaints, discovery, and motions; handling hearings regarding evidentiary, procedural, and dispositive issues; taking and defending fact witness, expert witness, and corporate representative depositions; experience at mass tort trials including preparing witnesses and creating examination outlines; preparing, negotiating and arguing deposition designations; handling pre-trial motions and arguments.

Freese & Goss, PLLC

Birmingham, AL

Associate (2012 – Present); Law Clerk (2010 – 2012)

Represented clients in a wide range of complex litigation including pharmaceutical and medical device mass torts, medical malpractice, and catastrophic injury cases.

Ball, Ball, Matthews & Novak, P.A.

Montgomery, AL

Law Clerk (Summer 2010)

Researched and drafted various motions in the following areas: personal injury, property, and construction litigation; attended depositions, mediations, and hearings.

Beckum Kittle LLP

Birmingham, AL

Law Clerk (Summer 2010)

Conducted initial client consultations; researched and prepared various pleadings and motions in employment and personal injury matters.

EDUCATION

Cumberland School of Law

Birmingham, AL

Doctor of Jurisprudence, 2012

Honors and Activities: Dean's List; National Negotiation Team Member; Finalist in The Haley Trial Team Competition; Trial Advocacy Board Member

University of Alabama

Tuscaloosa, AL

Bachelor of Arts in English, 2008

Honors and Activities: Sigma Tau Delta (National English Honor Society); Dean's List

AWARDS / MEMBERSHIPS

Super Lawyers: Mid-South Rising Star; Personal Injury-Products (2018)

National Trial Lawyers: Top 100 Trial Lawyers (2014 – Present)

American Association for Justice: member

Alabama Association for Justice: member

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REPRESENTATIVE CASES

- *Carolyn Lewis v. Ethicon, Inc. and Johnson & Johnson*, 2:12-cv-04301 (Southern District of West Virginia) – First bellwether trial in the Ethicon/Johnson & Johnson Transvaginal Mesh MDL
- *Linda Batiste v. Ethicon, Inc. and Johnson & Johnson, et al.*, DC-12-14350 (Dallas County, Texas) – Product liability and medical malpractice action involving Ethicon/Johnson & Johnson transvaginal mesh resulting in \$1.2 million verdict
- *Martha Salazar v. Jorge Francisco Lopez, M.D. and Boston Scientific Corporation*, DC-12-14349 (Dallas County, Texas) – Product liability and medical malpractice action involving Boston Scientific transvaginal mesh resulting in \$74 million verdict
- *Coleen Perry v. Hung T. Luu, M.D. et al.*, S-1500-CV-279123 (Kern County, California) – Product liability and medical malpractice action involving Ethicon/Johnson & Johnson transvaginal mesh resulting in \$5.7 million verdict
- *Sharon Carlino, et al. v. Ethicon, Inc. and Johnson & Johnson*, June Term 213, No. 3470 (Philadelphia County, Pennsylvania) – Product liability action involving Ethicon/Johnson & Johnson transvaginal mesh resulting in \$13.5 million verdict